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Marlene Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, SW  
Room TW-A325  
Washington, DC 20554

Re: Television Station KTFK-DT  
Stockton, California  
FIN: 20871

Dear Ms. Dortch:

Transmitted herewith on behalf of Telefutura Sacramento LLC, licensee of television station KTFK-DT, Stockton, California, is the station's response to the letter of February 3, 2006 from Clay C. Pendarvis, Associate Chief, Video Division, Media Bureau. This submission is timely made within 30 days of the date of that letter.

Please direct any communications regarding this matter to the undersigned.

Sincerely,



Lauren Lynch Flick

Attachments

## **Statement in Support of Second Round DTV Channel Election**

Telefutura Sacramento LLC, licensee of KTFK-DT, Stockton, California ("KTFK"), is submitting this filing to respond to the Media Bureau's letter of February 3, 2006 (the "Media Bureau Letter"). In that letter, the Bureau raised two issues regarding KTFK's participation in a negotiated channel agreement that, upon approval, would entirely conclude the DTV channel election process in Northern California and the surrounding region. Specifically, the Bureau noted that the transmitter site move KTFK must make in order to obtain a viable DTV channel while still leaving sufficient usable DTV channels to permit continued operations by the other Northern California stations participating in the Second Round (all of whom are parties to the negotiated channel agreement) results in a coverage loss area as well as a corresponding coverage gain area for KTFK.

In the Media Bureau Letter, the Commission invited KTFK to identify "offsetting factors" demonstrating that the required move would be in the public interest. The letter also required that KTFK amend its application so as to comply with the Commission's policy to "not allow stations to increase their technical operating facilities to serve larger coverage areas as part of NCAs." Media Bureau Letter at 2. By this filing, KTFK amends its application to ensure that it will not serve a larger coverage area than its currently licensed out-of-core facilities, and identifies numerous public interest benefits resulting from the Commission's approval of the Northern California negotiated channel agreement and KTFK's proposed channel 26 operation. Specifically, KTFK notes that: the number of viewers who would lose network service as a result of the channel 26 proposal is only 0.6% of the population it currently serves, the population in the loss area is exceedingly well served by other stations and receives service from between eight and twenty-one full power television stations, the channel 26 proposal eliminates redundant network service and thereby permits new network service to over 440,000 viewers, and approval of the Northern California negotiated channel agreement will bring an early conclusion to the selection of permanent DTV channels for all stations in Northern California, ensuring continued service to the public by all Northern California stations at the conclusion of the DTV transition and allowing all stations to proceed with certainty in the planning and implementation of their permanent DTV operations.

KTFK is a Spanish-language station carrying the programming of the Telefutura Network. It operates on analog channel 64 and was assigned digital channel 62 by the Commission, making it one of only a handful of stations with both channels located outside of the core television spectrum. As a result, it was not permitted to participate in the first round of DTV channel elections. Its current transmitter site is Mount Diablo, which is located between the San Francisco and Sacramento markets. However, because its community of license is Stockton, Nielsen has assigned KTFK to the Sacramento-Stockton-Modesto DMA, allowing it to be jointly owned with San Francisco-Oakland-Modesto DMA stations KDTV and KFSF-TV. KFSF-TV also carries the programming of the Telefutura Network. Both KFSF-TV and KTFK air Telefutura programming on a 24/7 basis, except for each station's local programming, which in the case of KFSF is oriented toward issues of interest to residents of the San Francisco area, and in the case of KTFK is oriented toward issues of interest to residents of the Sacramento-

Stockton area. As a result of its operation from Mount Diablo, the noise-limited contour of KTFK substantially overlaps the noise-limited contour of KFSF. *See* Figure 3 of the attached Engineering Exhibit.

One other television station, KTNC-DT, also operates from Mount Diablo. Because KTFK and KTNC-DT are both located on a mountaintop between San Francisco and Sacramento and require a permanent DTV channel, both stations needed to locate a channel that would not cause interference with stations in either market. As demonstrated in the attached Engineering Exhibit, this requirement severely limits the potentially usable channels. In fact, other than low VHF channels, which the Commission itself has noted are not well-suited for DTV use,<sup>1</sup> the only channel potentially available is channel 14, which KTFK's sister station KDTV surrendered in the first round of DTV channel elections in order to remain on its current DTV channel.

As only one viable channel is available for use on Mount Diablo, but two stations are located there, it became clear that one of the two stations would have to relocate from Mount Diablo. More specifically, that station would need to move to the Sacramento side of the mountains where the terrain obstruction between a new transmitter site and the San Francisco market would make other channels usable so long as the station was willing to collocate with the other stations in the Sacramento market at the Walnut Grove antenna farm. Because KTFK's city of license, Stockton, is on the east side of the mountains and can be served from the Walnut Grove site, and KTNC-TV's city of license, Concord, is on the northwest side of the mountain, KTFK agreed as part of the negotiated channel election agreement not to pursue channel 14 and to instead select a channel (26) that could be used as long as the station relocated to the Sacramento-Stockton antenna farm.

Approval of the Northern California negotiated channel agreement and the channel elections contained therein is clearly in the public interest, as it permits both KTFK and KTNC-DT to continue service to the public at the conclusion of the DTV transition, while bringing to a certain and early conclusion the selection of permanent DTV channels for all stations in Northern California. Approval of the agreement will therefore both ensure continued service to the public by all Northern California stations at the conclusion of the DTV transition while allowing all stations to proceed with certainty in the planning and implementation of their permanent DTV operations.

While the public interest benefits of such a result are manifest, the Media Bureau has raised two technical concerns regarding the required transmitter site move. Each is addressed herein.

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<sup>1</sup> *See Advanced Television Systems and Their Impact upon the Existing Television Broadcast Service*, Sixth Report and Order, 12 FCC Rcd 14588, at ¶ 82 (1997) (subsequent history omitted) (noting that "TV operations on the lower VHF channels 2-6 are subject to a number of technical penalties, including higher ambient noise levels due to leaky power lines, vehicle ignition systems, and other impulse noise sources and interference to and from FM radio service."); *see also Second Periodic Review of the Commission's Rules and Policies Affecting the Conversion to Digital Television*, 19 FCC Rcd 18279, at ¶ 63 and n.129 (2004) (permitting low VHF licensees to (i) release low VHF channels after the first round of DTV channel elections; and (ii) seek an alternate tentative channel designation in the third round of DTV channel elections, after acknowledging claims that "in some cases low VHF channels may not offer licensees the ability to provide the best DTV service to the public" and concluding that "low VHF licensees should be afforded an additional opportunity to find a channel that may better serve the public.").

*Potential Loss of Service.* First, the Media Bureau Letter notes that the change in transmitter site will necessarily result in a loss area and invites the station to identify offsetting public interest factors that outweigh any loss of service. As discussed above, the move is necessary to implement the public interest benefits of the Northern California channel election agreement, and more importantly, the public interest benefits of KTFK's continued operation at the conclusion of the DTV transition. Obviously, any loss of service resulting from a change in transmitter site is de minimis in comparison to the loss of service inherent in either KTFK or KTNC-TV being forced to terminate operation because only one viable channel exists for both of them to use.<sup>2</sup>

Fortunately, however, the actual loss of program service created by the move is minimal. As indicated in the attached Engineering Exhibit, the vast majority of the loss area already receives identical programming from KFSF, with the exception of KTFK's local programming. However, since the loss area is in the San Francisco market, the viewers there will be better served by receiving KFSF's San Francisco-oriented local programming than receiving KTFK's Sacramento/Stockton-oriented local programming in any event. As the Media Bureau stated in approving a similar site move in the San Francisco market by NBC, "[w]e are less concerned about the withdrawal of service here, because the vast majority of people located within the loss area will continue to receive NBC network service from other NBC affiliates, and are also well served by other stations." *KNTV License Inc.*, 19 FCC Rcd 15479, 15485 n.11 (MB 2004). See also *Citadel Communications Company Ltd.*, 10 FCC Rcd 11910, ¶¶ 25 and 36 (1995) (excluding from the Commission's loss calculation those viewers who would continue to receive ABC programming from other ABC stations).

The facts here are even stronger than in the *KNTV* or *Citadel* decisions, as 99.3% of the population that would no longer receive KTFK's programming already receive Telefutura programming from KFSF, and are also served by as many as 28 other stations. Of the 0.6% of the loss area population that cannot receive the KFSF signal over the air (29,691 people), only 5,778 are Hispanic viewers likely to be watching a Spanish-language program service.<sup>3</sup> This minimal service loss will be further mitigated by the fact that some of these viewers will be cable or satellite subscribers that receive KFSF through their cable or satellite service.

In addition, as the attached Engineering Exhibit indicates, this very small loss area population will still receive a minimum of eight full power television signals, with some portions receiving as many as 21 such signals. The Commission has held that areas receiving five or

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<sup>2</sup> The attached Engineering Exhibit discusses the numerous technical and other reasons why assigning a low VHF channel to KTFK is not an option that would serve the public interest. In particular, it notes that with the DTV channel elections coming to a conclusion, only a single California station, located in rural Eureka, has elected a low VHF channel, leaving a large contiguous block of low VHF spectrum available for reallocation by the FCC to numerous other more suitable wireless uses in California, and in the Bay Area in particular. Assigning a single low VHF channel to a station broadcasting into both San Francisco and Sacramento would unnecessarily block many of these alternate uses, particularly given that KTFK has presented a very beneficial alternative approach.

<sup>3</sup> As discussed above and in the attached Engineering Exhibit, the only option other than channel 14 that would allow KTFK to operate from its existing transmitter site is to utilize a low VHF channel. However, the well-recognized deficiencies of low VHF DTV operation would likely result in a far higher number of viewers being unable to reliably obtain KTFK's signal than the de minimis 29,915 viewers (0.6% of the population within KTFK's current DTV contour.) that would lose the Telefutura program service under KTFK's channel 26 proposal.

more signals are already well-served. *See Reading Broadcasting, Inc.*, 16 FCC Rcd 8309, ¶ 20 (ALJ 2001) (“The areas and populations contained in each of these two Grade B service areas are neither unserved nor underserved inasmuch as all of the areas and populations to be served by whoever wins already receives more than five services.”); *Amendment of Sections 73.606(b), Table of Allotments, Television Broadcast Stations, and 73.622(b), Table of Allotments, Digital Broadcast Television Stations (Asheville, North Carolina and Greenville, South Carolina)*, 18 FCC Rcd 15577, ¶ 4 n.3 (Vid. Div. 2003) (“reception areas that receive at least five broadcast services are considered to be well-served.”) *citing Amendment of Section 73.202(b), Table of Allotments, FM Broadcast Stations (Garberville and Hydesville, California)*, 9 FCC Rcd 3125, ¶ 4 n.5 (AB 1994) (“Accordingly, within a given reception area, any count of radio services beyond five is unnecessary.”).

In short, the actual loss area that will be created by the move of KTFK’s transmitter site is both de minimis and already well served by other television stations. As a result, there is very little public interest detriment in permitting implementation of the channel 26 proposal, and much public interest benefit to outweigh the de minimis service loss.

However, the public interest benefits of implementing KTFK’s channel 26 election are actually far greater than just allowing KTFK’s continued operation and a prompt and successful conclusion to the DTV channel election process. Balanced against a possible loss of Telefutara programming to 29,691 viewers is providing a new broadcast and network service to 443,729 viewers in the Sacramento market, where KTFK’s community of license is located. In approving a proposal by NBC to move its San Francisco area transmitter site, the Media Bureau noted that:

According to NBC, over a million people will lose service from KNTV(TV) if the station is relocated. The majority of those people, however, reside within the Monterey-Salinas or Fresno-Visalia DMAs and receive a full complement of signals from full-service and Class A television stations licensed to communities in those markets, including the NBC affiliates in those markets. Although 21,170 viewers will lose their only predicted over-the-air NBC network service from the San Bruno Mountain site, KNTV(TV) will provide an over-the-air NBC network service to almost 400,000 persons who have been without that service since 2002. We believe that the public benefits in restoring network service to almost 400,000 persons outweighs the detriment caused by withdrawing network service from 21,170 persons.<sup>4</sup>

Here, viewers in the loss area will also continue to receive Telefutara programming from their local San Francisco Telefutara affiliate, and the differential between the 29,691 viewers that actually will lose over-the-air Telefutara service and the 443,729 that will gain access to the Telefutara network service is larger than the number the Bureau found so compelling in the *KNTV* decision. As a result, there are substantial public interest benefits in permitting KTFK to implement its DTV channel election proposal, and only a de minimis loss of service that would result from achieving these benefits.

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<sup>4</sup> *KNTV License Inc.*, 19 FCC Rcd 15479, 15485 (MB 2004) (footnote omitted).

*Broadcast Service to New Areas.* With regard to the second issue raised in the Media Bureau Letter, the Bureau quotes language from a Commission public notice stating that “[w]e will not allow stations to increase their technical operating facilities to serve larger coverage areas as part of NCAs.” However, the letter then states that “[t]he contour you have proposed extends a significant distance north of the geographic area presently served” and indicates that the station should “amend your Form 385 to eliminate the proposed new coverage area within 30 days of the date of this letter.” Media Bureau Letter at 2.

As addressed above, the shift in signal coverage to some new areas is the unavoidable result of having to collocate the station’s transmitter site at the Walnut Grove antenna farm in order to avoid first-adjacent channel interference. More importantly, the public notice quoted in the Media Bureau Letter by its plain language does not prohibit coverage of a “different” area, but merely prohibits stations from “increas[ing] their technical operating facilities to serve larger coverage areas.” As is evident from the discussion above addressing the Bureau’s concern that the channel 26 proposal creates loss areas, KTFK’s channel 26 proposal clearly does not represent an effort to increase KTFK’s technical operating facilities, and certainly does not maximize the station’s facilities. Instead, it is the unavoidable result of having too many stations needing too few viable DTV channels.

Consistent with the Media Bureau Letter, however, KTFK does note that while its intent in filing the technical parameters for operation on channel 26 was to replicate the same size coverage area it currently has (although unavoidably shifted to the north to prevent the creation of new interference), more recent analysis indicates that the originally specified operating parameters exceed the station’s currently licensed coverage area. While the potential coverage is relatively small, and the Commission stated in the same public notice quoted in the Media Bureau Letter that “we also recognize that operation on a new channel at the facilities computed to serve the same coverage area predicted to be reached by operation at a station’s currently certified facilities could result in service to slightly larger (or smaller) populations,” KTFK is amending its channel 26 proposal as requested by the Bureau to ensure that the station’s coverage area on channel 26 will be the same size or smaller than its currently licensed coverage area.

To the extent that the Media Bureau Letter appears to go farther, and requests an amendment to the channel 26 proposal that would limit KTFK’s signal solely to the area within the station’s currently licensed contour in spite of the change in transmitter site, KTFK respectfully notes that such a requirement has no basis in Commission law or policy, and more importantly, would be contrary to the public interest.<sup>5</sup>

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<sup>5</sup> As a practical matter, operation of KTFK with the reduced facilities required by such an amendment would place KTFK in a competitively untenable position. As demonstrated in the attached Engineering Exhibit, collocating at the Walnut Grove site while keeping the station’s signal contour inside its existing contour would require a reduction in power down to the low power television range of 17 kW. This power level represents less than 5% of the *lowest-powered* DTV station currently at the Walnut Grove site and is not a viable option if KTFK is to competitively survive.

First, as discussed above, the only supporting language cited in the Media Bureau Letter merely prohibits stations from covering “larger coverage areas” by “increasing their technical operating facilities.” That is clearly not being proposed here, particularly in light of KTFK’s amendment to further limit its facilities at the Walnut Grove site. To the extent that the Bureau seeks to extrapolate from this language far broader requirements for presenting an acceptable channel proposal, the U.S. Court of Appeals for the DC Circuit has made clear that

the *quid pro quo* for stringent acceptability criteria is explicit notice of all application requirements: ‘when the sanction is as drastic as dismissal without any consideration whatever of the merits, elementary fairness compels clarity in the notice of the material required as a condition for consideration.’<sup>6</sup>

In reliance on the Commission’s announced rules and policies, KTFK has put forth a proposal on channel 26 and agreed (subject to approval of the Northern California negotiated channel agreement) to forego its right to seek channel 14 so that a certain and global resolution of the DTV channel election process in Northern California can be achieved. It would be patently unfair for the Bureau to now seek to apply greater restrictions on KTFK’s proposal than have been previously adopted and announced.

Even if, however, the policy asserted in the Media Bureau Letter could somehow be read to preclude coverage of any area outside a station’s existing contour, there is currently no public interest basis to support such a policy. As discussed in the attached Engineering Exhibit, the policy against a station maximizing its service area as part of the DTV channel election process is meant to provide a stable engineering database so that those making future channel elections have reliable engineering information on which to base their decisions. As approval of the Northern California negotiated channel election agreement will bring a final conclusion to the channel election process for the entire region, and KTFK’s proposed use of channel 26 could not possibly affect any other station’s channel election in any event, there is no longer any public interest rationale at all to support such a restrictive policy. The U.S. Court of Appeals for the DC Circuit has made clear that the FCC may not support its actions by citing a policy that has outlived its usefulness:

The FCC nevertheless argues that it is under no duty to explain its continued adherence to settled policy; it claims it must only explain *changes* in policy or departures from prior precedent. While the Commission is correct that changes of policy require a rational explanation, it is also true that changes in factual and legal circumstances may impose upon the agency an obligation to reconsider a settled policy or explain its failure to do so. In the rulemaking context, for example, it is settled law that an agency may be forced to reexamine its approach ‘if a

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<sup>6</sup> *Salzer v. FCC*, 778 F.2d 869, 875 and n.26 (D.C. Cir. 1985) citing *Radio Athens, Inc. (WATH) v. FCC*, 401 F.2d 398, 401 (D.C. Cir. 1968) and *Bamford v. FCC*, 535 F.2d 78, 82 (D.C. Cir. 1976) (“elementary fairness requires clarity of standards sufficient to apprise an applicant of what is expected.”).

significant factual predicate of a prior decision . . . has been removed.’ The Commission’s duty is even more pressing when the policy is embodied not in a binding regulation issued after public notice and comment but in a general statement of policy . . . . ‘When the agency applies [a general] policy in a particular situation, it must be prepared to support the policy just as if the policy statement had never been issued.

An agency cannot escape its responsibility to present evidence and reasoning supporting its substantive rules by announcing binding precedent in the form of a general statement of policy.’<sup>7</sup>

In the present case, any possible factual or public interest predicate for limiting a station’s flexibility in locating a channel that will allow it to offer the best possible service to the public has ceased to exist. The need for an absolutely “unchanging” engineering database has passed. As a result, even if the Commission had actually adopted a policy prohibiting channel elections requiring a shift in service area, there would be no public interest rationale to support its application here. The Bureau itself recognized as much in its Public Notice, released just three weeks ago, which stated that

we now are reaching the end of the channel election process and face a relatively small number of difficult cases that remain to be accommodated with tentative channel designations. For many of these stations, the channel options are very limited. . . . Therefore, in order to resolve as many Second Round elections as possible and thus expedite the conclusion of the channel election process, we will allow limited flexibility to those licensees unable to resolve their elected-channel conflicts.<sup>8</sup>

For those exact reasons, KTFK must be permitted the flexibility to conclude its channel election process as well.

Finally, *even if* a “no new area” policy existed, *and even if* there continued to be some public interest rationale supporting that policy, KTFK in its channel 26 election proposal specifically requested that the Commission grant any waivers necessary to effectuate that proposal given the ample public interest benefits discussed above. There is little doubt that the public interest benefits of accomplishing a swift and certain global resolution of all DTV channel elections in the region, while minimizing service loss, and bringing a new network service to 443,729 viewers are substantial public interest benefits against which there are no significant public interest detriments to be balanced. As the U.S. Court of Appeals for the D.C. Circuit stated in *WAIT Radio v. FCC*:

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<sup>7</sup> *Bechtel v. FCC*, 957 F.2d 873, 881 (D.C. Cir. 1992) quoting *WWHT, Inc. v. FCC*, 656 F.2d 807, 819 (D.C. Cir. 1981) and *Pacific Gas and Elec. Co. v. FPC*, 506 F.2d 33, 38-39 (D.C. Cir. 1974) (citations omitted; emphasis, brackets, and first ellipses in original).

<sup>8</sup> *Guidelines for Interference Conflict Analysis in the Second Round of DTV Channel Elections*, Public Notice, DA 06-378 (Feb. 17, 2006).



The salutary presumptions do not obviate the need for serious consideration of meritorious applications for waiver, and a system where regulations are maintained inflexibly without any procedure for waiver poses legal difficulties. The Commission is charged with administration in the “public interest.” That an agency may discharge its responsibilities by promulgating rules of general application which, in the overall perspective, establish the “public interest” for a broad range of situations, does not relieve it of an obligation to seek out the “public interest” in particular, individualized cases.<sup>9</sup>

In this particular, individualized case, the public interest clearly lies in the Commission’s approval of the Northern California channel election agreement and the effectuation of KTFK’s channel 26 proposal. Beyond the public interest benefits directly related to the DTV channel election process, the channel 26 proposal would sacrifice only redundant network service while bringing an entirely new network service to 443,729 viewers. In assessing another station’s proposal to modify its facilities, the Bureau stated that “this proposed provision of a new television service and a new network service to additional viewers, without the loss of such service to existing viewers, constitutes a significant public interest benefit.”<sup>10</sup> The channel 26 proposal here creates a far larger public interest benefit, and should be promptly approved by the Commission.

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<sup>9</sup> *WAIT Radio v. FCC*, 418 F.2d 1153, 1157 (D.C. Cir. 1969).

<sup>10</sup> *WVIT Inc.*, 12 FCC Rcd 18172, ¶ 5 (MMB 1997).

# ENGINEERING EXHIBIT

## **Second Round Channel Election**

KTFK-DT Stockton, CA

prepared by  
Univision/Telefutura Engineering

Engineering Exhibit  
**Second Round Channel Election**  
KTFK-DT Stockton, CA

Table of Contents

Engineering Statement

Table I – Channel Availability at Mt. Diablo

Table II – Channel Availability at Walnut Grove

Table III – KTFK-DT Coverage

Table IV – Coverage Changes

Table V – Coverage “Removed”

Table VI – Northern “Removal” Area Services

Table VII – Southeastern “Removal” Area Services

Table VIII – Prospective Coverage of Constrained Service

Table IX – Coverage “Removed” by Constrained Service

Figure 1 – Site Locations

Figure 2 – Predicted Noise-Limited FCC Contours

Figure 3 – Predicted Loss Area

Figure 4 – Other DTV Services

Figure 5 – Northern “Removal” Area

Engineering Statement  
Second Round Channel Election  
KTFK-DT Stockton, CA

I. Background

KTFK-DT is a “two out-of-core” station, providing analog service on channel 64 and digital service on channel 62. In the Second Round of DTV channel elections, KTFK-DT entered into a Negotiated Channel Agreement (NCA) with five other Northern California DTV licensees.<sup>1</sup> That agreement specified the channels that each would elect, in order to avoid conflict with each other and thereby end the election process in the region. KTFK-DT specified channel 26, relocated to the Walnut Grove antenna farm, where all other stations licensed to Sacramento or Stockton are sited. KTFK-DT presently operates from Mt. Diablo, a peak situated between the San Joaquin Valley, where Stockton is located, and the San Francisco Bay area. Mt. Diablo is located in Contra Costa County, within the boundaries of the San Francisco - Oakland - San Jose Designated Market Area, which does not include Stockton.

KTFK-DT specified the Walnut Grove site because of the lack of suitable channels at its present Mt. Diablo transmitter site. This would otherwise cause it to be in irresolvable conflict with another station operating from Mt. Diablo, KTNC-DT, licensed to nearby Concord, CA. When the Second Round channel selections were considered by the six Northern California licensees, only the low-band VHF (LVHF) channels and channel 14 were found to be usable at Mt. Diablo. To resolve the conflict of two Mt. Diablo stations seeking the one available non-LVHF channel, KTFK-DT proposed to relocate closer to its community of license.

II. Channel Availability

A. Mt. Diablo

Table I presents the channel occupancies and potential interference conflicts that impact the two stations located on Mt. Diablo. Figure 1 illustrates the transmitter sites utilized by Northern California stations, to provide a spatial reference for the channel usage shown. Stations which preclude the use of a channel are shown in boldface type; other stations shown cause restrictions on matching coverage to that licensed to the Mt. Diablo stations.

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<sup>1</sup> KFTY, Santa Rosa; KRON-DT, San Francisco; KTNC-DT, Concord; KTVU-DT, Oakland; and KVIE-DT, Sacramento

Aside from LVHF channels, there are only seven channels not having fatal co-channel conflicts. Of these, five have first-adjacent channel conflicts that cannot be resolved by any practical combination of antenna radiation pattern and power and one (channel 15) conflicts with adjacent-channel land mobile operations in the San Francisco-Oakland metropolitan area. Only channel 14 has no conflicts with tentative channel occupancies or land mobile assignments, but there are two stations presently located at Mt. Diablo in need of in-core channels.

The first-adjacent channel conflicts are not readily resolvable by directional antenna use, because Mt. Diablo is essentially located midway between the Walnut Grove (Sacramento-Stockton), Mt. Sutro and Mt. San Bruno (San Francisco), and Mt. Allison (San Jose) transmitter sites. The locations where such interference would result are so close to Mt. Diablo that broad signal suppression, at depths not practically achievable, would be necessary.

#### B. Walnut Grove

Table II presents the channel occupancies and potential interference conflicts that exist at the Walnut Grove antenna farm. Seven non-LVHF channels have no fatal co-channel conflicts. Of these, there are at least four channels where operation appears feasible using practical antennas and power levels. In several cases, collocation with adjacent-channel stations at Walnut Grove would eliminate any potential for interference.

#### C. Channel 14

The NCA provided that KTNC-DT would specify use of channel 14, as that was the only high-band VHF (HVHF) or UHF channel available for use at Mt. Diablo. Unlike KTFK-DT, KTNC-DT does not have a "sister" station in either the San Francisco - Oakland - San Jose or Sacramento-Stockton markets which provides duplicate programming. Had the NCA not been entered into by its participants, KTNC-DT and KTFK-DT would have been in irreconcilable conflict which the Commission would need to resolve after the Third Round elections.

#### D. Low VHF Channels

Only one station in the entire State of California, KIEM-DT, located in rural Eureka, has been tentatively assigned a LVHF channel. It is believed that, if the proposed assignment of KTFK-DT to channel 26 is accepted, there will be no other LVHF usages in the State. This would allow the Commission to reallocate LVHF channels to wireless and/or other uses in the San Francisco Bay area.

The Commission is also well aware of the serious impulse-noise and other problems that limit low-band VHF DTV service quality, even with the best receiving and

transmitting equipment. That is not the only problem facing DTV broadcasters contemplating LVHF operation. The consumer electronics industry, particularly mass-market retailers such as “big box” stores, is marketing small antennas to consumers that have element lengths which are a small fraction of a wavelength at LVHF frequencies. Such antennas will not receive LVHF signals nearly as effectively as they will UHF and, to a lesser extent, HVHF. This is also impacted by restrictions on outdoor antenna size by residential regulations. Although the Commission’s OTARD rule (47CFR§1.400) pre-empts many such restrictions, few consumers are aware of their rights, particularly in urban areas. Generally, with so few LVHF channels being occupied by DTV stations, receiver manufacturers have little incentive to design and produce high-quality LVHF tuner sections. All of these factors leave DTV stations operating on LVHF channels crippled in comparison to their competitors occupying HVHF and UHF channels.

### III. Coverage Relocation and Facilities Amendment

As noted above, the proposed relocation of KTFK-DT from Mt. Diablo to Walnut Grove arises from the lack of sufficient HVHF and UHF channel availability at its licensed site. KTFK-DT specified technical facilities for its proposed channel 26 operation at Walnut Grove which adequately cover its city of license and the surrounding area. Because the transmission site is substantially relocated, its service “footprint” cannot and does not match that of the licensed DTV facility.

KTFK-DT previously filed with the Commission the technical parameters of its proposed operation on channel 26. At the time of filing, it was intended and believed that the service area of the proposed facility would not exceed that of KTFK-DT’s licensed operation. However, the FCC staff later asserted that the proposed facilities would expand KTFK-DT’s total service area. Accordingly, the effective radiated power for the proposed channel 26 operation is being reduced to 210 kW. All other technical parameters remain unchanged.

Figure 2 illustrates the predicted coverage for the licensed and proposed channel 26 facilities of KTFK-DT, with the terrain-limited areas and populations served described below:

Table III

KTFK-DT Coverage	Licensed Facility		425kW Ch. 26		210 kW Ch. 26	
	Area	pop.	Area	pop.	Area	pop.
OET-65	25,681	7,498,530	27,814	4,135,145	24,975	3,884,886
Conventional	28,080	9,083,335	31,300	5,701,682	27,850	4,880,039

The first row indicates areas (in square kilometers) and populations where interference-free service is obtained without terrain obstruction within the noise-

limited coverage contour, in accordance with OET-69 procedures. The second row shows areas and populations determined within the conventionally-predicted noise limited contours, without consideration of terrain obstruction. The latter data is the basis for the percentages shown in Table IV. The amended 210 kW proposal will cause no increase in KTFK-DT's terrain-limited service area or population.

Because KTFK-DT's service is relocated, there will be a loss of area southwestward and a gain northeastward. These changes are summarized below:

Table IV

Coverage Changes	From Licensed Facility			
	Area	(%)	Pop.	(%)
Coverage loss zone	7,417	26.4	4,647,025	51.2
Coverage gain zone	7,178	25.5	443,729	4.9

#### IV. Coverage Removal

The FCC staff has suggested that the reduction of coverage shown in the foregoing Table may not serve the public interest. However, the loss is unavoidable in that it arises from the combined effects of the northeastward site move and signal suppression toward the San Francisco Bay area, the latter in order to keep adjacent-channel interference below the Commission's 0.1% criterion. Every UHF channel potentially available by relocating to Walnut Grove has a similar restriction toward the Bay Area.

##### A. Coverage Replacement by KFSF-DT

The licensee of KTFK-DT is ultimately owned by Telefutura Television Group, Inc., as is the licensee of KFSF-DT, Vallejo, CA. Both stations carry identical Telefutura Network programming. The only differences in programming are local public affairs and news briefs. KFSF-DT operates from Mt. Sutro and covers most of the KTFK-DT "removal" area and virtually all of the population resident therein.

Table V

Coverage "Removed"	From Licensed Facility				Hispanic Population	
	area	(%)	pop.	(%)	pop.	(%)
Total	7,417		4,647,025		955,350	
KFSF-DT Duplicated	5,731	77.2	4,617,110	99.3	949,572	99.4
KTFK-DT Unique	1,686	22.7	29,915	0.6	5,778	0.6

### C. Other Available Television Services

An “other services” study was conducted to determine the extent of remaining service to the area where KTFK-DT proposes to remove coverage. The noise-limited coverage contours of other stations were determined from the stations’ certified DTV facilities, using 3 arc-second terrain data, the F[50,90] propagation curves, and CDBS data or, where pertinent<sup>2</sup>, the 1997 allocation (replication) parameters. The noise-limited contours (including “dipole factor”) were used in order to be consistent with the staff’s methodology for replicating DTV service areas.

All of the coverage “removal” area is well-served, with parts of the area being covered by as many as 29 full-power DTV stations and a vast majority of the area predicted to receive at least 15 such stations. Even in the least served portion of the removal area, viewers receive at least 8 full-power DTV television services.

The central part of the “removal” zone encompasses the San Francisco Bay metropolitan area. Fourteen stations are licensed to serve the area from the three primary transmission sites, Mt. Allison, Mt. San Bruno, and Mt. Sutro. Eleven of those stations provide greater coverage than does KFSF-TV, mentioned above, which covers 99.3% of the “removal” population. The predicted contours of KTNC-DT (Concord, from Mt. Diablo) and five Sacramento – Stockton stations also encompass most of this metropolitan area. Additional services are provided to parts of the area by KRCB (Cotati) and the four Monterey – Salinas stations. For over 99% of the population of the loss area, there are a multitude of other services available.

The loss zones, not covered by KFSF-DT, are located at the northern and southeastern corners of the overall “removal” area crescent. These areas are located in mountainous areas to the north (northeast of Santa Rosa) and mountainous/rural areas to the southeast (west of Newman), where population is small and far less dense than it is in the Bay Area.

The majority of the northern “removal” corner<sup>3</sup> is covered completely by station KRCB-DT and almost completely by 3 Sacramento – Stockton stations. The area is also partially served by 12 Bay Area stations and KTNC-DT. A minimum of eight other services, not including local station KFTY-DT<sup>4</sup>, are available. Figure 5 illustrates the coverage “removal” region beyond the KFSF-DT contour and the contours of other stations which cover the area. The attached Table VI lists the stations providing service to at least part of this area.

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<sup>2</sup> Stations which certified “replicated” facilities are KCRA-DT, KGO-DT, KPIX-DT, KXTV-DT, and KMTP-DT

<sup>3</sup> Covered by the licensed KTFK-DT facility, but not by the proposed channel 26 facility nor by KFSF-DT

<sup>4</sup> KFTY-DT, Santa Rosa, is a Second-Round elector. It has been directed by the FCC staff to resolve deficiencies in its specified facilities, so its future coverage cannot be evaluated precisely at this time. However, because its city of license and transmitter site are both close to the “removal” sector, it can be expected to cover most, if not all, of the area. For the same reason, Sacramento station KVIE-DT was not included in this study.



The situation is similar in the southeastern “removal” corner. Four of the Sacramento – Stockton – Modesto stations (KCRA-DT, KMAX-DT, KOVR-DT, KXTV-DT) cover the entire zone, as do two Mt. Allison stations (KDTV-DT and KICU-DT) and three Salinas/Monterey stations (KCAH-DT, KSBW-DT, KSMS-DT). Additional partial coverage to this area is provided by other Sacramento – Stockton – Modesto stations, the other two stations located at Mt. Allison, the other two Monterey – Salinas stations, KTNC-DT, and at least one Fresno-Visalia area station. As a result, a minimum of 11 other services are available throughout this southeastern “removal” area. The attached Table VII lists the stations providing service to this zone.

### **Service Extension**

The Commission staff has objected to the proposed extension of KTFK-DT service northeastward, noting that stations may not, via NCAs, “maximize” their service. KTFK-DT does not seek service maximization at this time. Its service area changes as a result of the site relocation that is necessitated by the lack of available HVHF and UHF channels at Mt. Diablo, but encompasses no more area or population than does its licensed facility. In the Technical Narrative accompanying its November 2004 technical facilities filing, BSRCT- 20051130BIG, the station’s technical consultant requested waiver of any relevant rule, policy, or interpretation thereof, due to the unique circumstances present in this case and in the interest of concluding channel elections for the entire region.

#### **A. Indicia of Maximization**

“Maximization” in the context of DTV facilities specification means that the technical parameters submitted result in the maximum effective radiated power (ERP) and antenna height above average terrain (HAAT) permitted by the station class or interference constraints, whichever is less. KTFK-DT’s channel 26 proposal, especially as presently amended, does not involve “maximization”, in that neither limit has been reached and the facilities can be modified in the future to achieve that. Further, the maximum noise-free service range of the licensed KTFK-DT facility is 115 km, at 10° ETN. The similar service range of the KTFK-DT’s amended channel 26 proposal is 108 km at 10° and 140° ETN. The overall “reach” of the station is not being increased in its proposal.

Figure 4 illustrates the proposed noise-limited coverage of KTFK-DT and that of the stations presently licensed at Walnut Grove. The proposed coverage does not exceed that of KSPX-DT, the station having the least coverage from Walnut Grove, with the exception of a small sliver where that station’s radiation is at a minimum. KTFK-DT will seek maximization and coverage parity with those other stations at such time as the Commission provides such an opportunity.

Further, stations seeking to “maximize” service were authorized under 47CFR §73.623 to cause interference up to 2% of the service population residing within another DTV station’s noise-limited contour, provided that the cumulative interference population of all DTV interferers did not exceed 10% of that within the impacted station’s noise-limited contour. The NCA to which KTFK-DT is a party does not provide for any relief of the Commission’s much more stringent interference criterion for the DTV elections, 0.1%. The proposed operation of KTFK-DT does not violate that restriction.

## B. Preclusion

The underlying purpose of the “no coverage extension” policy is to ensure that stations selecting channels in later election rounds are not prejudiced by any coverage extension granted in an earlier round. Were coverage extended via an NCA in the First Round, the channel availability research that a Second Round elector had performed prior to the First Round’s conflict resolution deadline could become irrelevant. An extension of a service area by an earlier round licensee could cause a later round licensee to have to modify its antenna radiation pattern in order to make its preferred channel acceptable.

The proposed NCA was intended to end the channel election process in Northern California, Southern Oregon, and Northwestern Nevada, so the coverage “extension” proposed by KTFK-DT would not impact any Third Round elector. Channels 25-27 are not usable elsewhere in the region, due to interference constraints from tentative assignments, so no station potentially entering the Third Round would be prejudiced in any way by approval of KTFK-DT’s amended channel 26 proposal.

## **Constrained Service**

Alternative technical facilities were examined which could meet the Commission staff’s request that KTFK-DT not extend its coverage in any direction. A “no-extension” facility that also meets the interference protection criteria, while employing an off-the-shelf antenna<sup>5</sup>, would operate at an effective radiated power (ERP) of only 17 kW. This is barely above the 15 kW maximum established by the Commission for DTV “companion” channels of LPTV stations and less than 5% of the ERP utilized by the lowest-powered, DTV station located at Walnut Grove. It would utilize an ERI “ALP-BR” antenna horizontal radiation pattern oriented at

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<sup>5</sup> Custom antennas can be tailored to particular radiation constraints, but the development of a “practical” custom pattern requires anechoic chamber or outdoor range testing and development work that cannot be accomplished in the time provided by the staff for KTFK-DT to submit its response.

220° ETN.<sup>6</sup> Such operation would cause further reduction in service, in areas not served by sister station KFSF-DT. The coverage within the noise limited contour provided by such a facility is detailed in the following table.

Table VIII

Prospective Coverage	Licensed Facility		Elected 210 kW Facility		Hypothetical 17kW	
	area	pop.	Area	pop.	area	pop.
Conventional	28,080	9,083,335	27,850	4,880,039	17,520	3,716,736

The coverage removed by such a low-power operation is:

Table IX

Coverage “Removed”	From Licensed Facility				From Elected 210 kW Facility			
	Area	(%)	pop.	(%)	Area	(%)	pop.	(%)
Conventional	10,560	37.6	5,336,599	58.8	10,720	38.4	1,193,239	32.1

In essence, such a facility would be little more than a digital LPTV station and hardly competitive.

### Conclusion

The proposal of KTFK-DT to relocate to Walnut Grove was necessitated by the lack of sufficient usable channel availability at its present Mt. Diablo site and the joint efforts of all 6 Second-Round stations in Northern California to avoid channel election conflict. This relocation and the coverage constraints resulting from interference protection requirements cause removal of some predicted service, but the area and population are well-served and nearly all of the population receives duplicate service from a “sister” station carrying the same network programming. The proposed facilities at Walnut Grove do “extend” coverage in the direction opposite of its removal, but not in a way that “maximizes” service, increases the total coverage area, impacts the channel choices of any Third Round electors, or provides KTFK-DT any competitive advantage. Acceptance of the NCA and KTFK-DT’s proposal would end the DTV election process in Northern California and preclude the need for the Commission staff to expend time on analysis of Third Round elections from this region, while leaving the LVHF channels available for other uses.


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<sup>6</sup> Other off-the-shelf antennas from major manufacturers were considered and were found not to provide the broad and deep suppression necessary to avoid coverage extension and/or lacked the suppression westward necessary to avoid adjacent-channel interference to KTSF-DT.

### Acknowledgement

Much of the technical data cited herein was developed cooperatively by W. Jeffrey Reynolds, Jerome Manarchuk, P.E., and Thomas Howell, all of the consulting engineering firm duTreil, Lundin & Rackley, Inc., utilizing that firm's proprietary coverage prediction and coverage analysis software.

3 March 2006



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Table I – Channel Availability at Mt. Diablo

<u>Channel</u>	<u>Co-Channel Conflict</u>	<u>Lower Adjacent Conflict</u>	<u>Upper Adj. Conflict</u>
2	(none)	(none)	(none)
3	(none)	(none)	(none)
4	(none)	(none)	(none)
5	(none)	(none)	(none)
6	[NCE FM]	(none)	(none)
7	<b>KGO San Francisco</b>	(none)	<b>KSBW Salinas</b>
8	<b>KSBW Salinas</b>	KGO San Francisco	<b>KVIE Sacramento*</b>
9	<b>KVIE Sacramento*</b>	KSBW Salinas	<b>KXTV Sacramento</b>
10	<b>KXTV Sacramento</b>	KVIE Sacramento*	<b>KNSO Merced</b>
11	<b>KNSO Merced</b>	KXTV Sacramento	<b>KNTV San Jose</b>
12	<b>KNTV San Jose</b>	KNSO Merced	<b>KCBA Salinas</b>
13	<b>KCBA Salinas</b>	KNTV San Jose	(none)
14	<b>KTNC Concord*</b>	(none)	(none)
15	<b>KBSV Ceres</b>	KTNC Concord*	<b>[LMRS San Francisco]</b>
16	<b>[LMRS San Francisco]</b>	(none)	<b>[LMRS San Francisco]</b>
17	<b>[LMRS San Francisco]</b>	<b>[LMRS San Francisco]</b>	<b>KUVS Modesto</b>
18	<b>KUVS Modesto</b>	<b>[LMRS San Francisco]</b>	
19	(none)	<b>KUVS Modesto</b>	<b>KBWB San Francisco</b>
20	<b>KBWB San Francisco</b>	(none)	<b>KMAX Sacramento</b>
21	<b>KMAX Sacramento</b>	KBWB San Francisco	(none)
22	(none)	<b>KMAX Sacramento</b>	<b>KRCB Cotati</b>
23	<b>KRCB Cotati</b>	(none)	(none)
24	(none)	<b>KRCB Cotati</b>	<b>KOVR Stockton</b>
25	<b>KOVR Stockton</b>	(none)	(none)
26	(none)	<b>KOVR Stockton</b>	<b>KTSF San Francisco</b>
27	<b>KTSF San Francisco</b>	(none)	(none)
28	(none)	<b>KTSF San Francisco</b>	<b>KPIX San Francisco</b>
29	<b>KPIX San Francisco</b>	(none)	<b>KQED San Francisco</b>
30	<b>KQED San Francisco</b>	KPIX San Francisco	<b>KSMS Monterey</b>
31	<b>KSMS Monterey</b>	KQED San Francisco	<b>KION Monterey</b>
32	<b>KION Monterey</b>	KSMS Monterey	<b>KMTP San Francisco</b>
33	<b>KMTP San Francisco</b>	KION Monterey	<b>KFSF Vallejo</b>
34	<b>KFSF Vallejo</b>	KMTP San Francisco	<b>KCRA Sacramento</b>
35	<b>KCRA Sacramento</b>	KFSF Vallejo	<b>KICU San Jose</b>
36	<b>KICU San Jose</b>	KCRA Sacramento	<b>KRON San Francisco*</b>
38	<b>KRON San Francisco*</b>	<b>KICU San Jose</b>	<b>KCNS San Francisco</b>
39	<b>KCNS San Francisco</b>	KRON San Francisco*	<b>KTXL Sacramento</b>
40	<b>KTXL Sacramento</b>	KCNS San Francisco	<b>KKPX San Jose</b>
41	<b>KKPX San Jose</b>	KTXL Sacramento	(none)
42	(none)	<b>KKPX San Jose</b>	<b>KCSM San Mateo</b>
43	<b>KCSM San Mateo</b>	(none)	<b>KTVU Oakland*</b>
44	<b>KTVU Oakland*</b>	KCSM San Mateo	<b>KBHK San Francisco</b>
45	<b>KBHK San Francisco</b>	KTVU Oakland*	<b>KQCA Stockton</b>
46	<b>KQCA Stockton</b>	KBHK San Francisco	<b>KTLN Novato</b>
47	<b>KTLN Novato</b>	KQCA Stockton	<b>KSPX Sacramento</b>
48	<b>KSPX Sacramento</b>	KTLN Novato	<b>KSTS San Jose</b>
49	<b>KSTS San Jose</b>	KSPX Sacramento	<b>KTEH San Jose</b>
50	<b>KTEH San Jose</b>	KSTS San Jose	<b>KDTV San Francisco</b>
51	<b>KDTV San Francisco</b>	KTEH San Jose	(none)

Table II – Channel Availability at Walnut Grove

<u>Channel</u>	<u>Co-Channel Conflict</u>	<u>Lower Adjacent Conflict</u>	<u>Upper Adj. Conflict</u>
2	(none)	(none)	(none)
3	(none)	(none)	(none)
4	(none)	(none)	(none)
5	(none)	(none)	(none)
6	[NCE FM]	(none)	(none)
7	<b>KGO San Francisco</b>	(none)	KSBW Salinas
8	<b>KSBW Salinas</b>	<b>KGO San Francisco</b>	KVIE Sacramento*
9	<b>KVIE Sacramento*</b>	KSBW Salinas	KXTV Sacramento
10	<b>KXTV Sacramento</b>	KVIE Sacramento*	KNSO Merced
11	<b>KNSO Merced</b>	KXTV Sacramento	KNTV San Jose
12	<b>KNTV San Jose</b>	KNSO Merced	KCBA Salinas
13	<b>KCBA Salinas</b>	KNTV San Jose	(none)
14	<b>KTNC Concord*</b>	(none)	(none)
15	<b>KBSV Ceres</b>	KTNC Concord*	[LMRS San Francisco]
16	<b>[LMRS San Francisco]</b>	(none)	[LMRS San Francisco]
17	<b>[LMRS San Francisco]</b>	[LMRS San Francisco]	KUVS Modesto
18	<b>KUVS Modesto</b>	[LMRS San Francisco]	
19	(none)	<b>KUVS Modesto</b>	KBWB San Francisco
20	<b>KBWB San Francisco</b>	(none)	KMAX Sacramento
21	<b>KMAX Sacramento</b>	KBWB San Francisco	(none)
22	(none)	KMAX Sacramento	<b>KRCB Cotati</b>
23	<b>KRCB Cotati</b>	(none)	(none)
24	(none)	<b>KRCB Cotati</b>	KOVR Stockton
25	<b>KOVR Stockton</b>	(none)	(none)
26	(none)	KOVR Stockton	KTSF San Francisco
27	<b>KTSF San Francisco</b>	(none)	(none)
28	(none)	KTSF San Francisco	KPIX San Francisco
29	<b>KPIX San Francisco</b>	(none)	KQED San Francisco
30	<b>KQED San Francisco</b>	KPIX San Francisco	KSMS Monterey
31	<b>KSMS Monterey</b>	KQED San Francisco	KION Monterey
32	<b>KION Monterey</b>	KSMS Monterey	KMTP San Francisco
33	<b>KMTP San Francisco</b>	KION Monterey	KFSF Vallejo
34	<b>KFSF Vallejo</b>	KMTP San Francisco	KCRA Sacramento
35	<b>KCRA Sacramento</b>	KFSF Vallejo	KICU San Jose
36	<b>KICU San Jose</b>	KCRA Sacramento	KRON San Francisco*
38	<b>KRON San Francisco*</b>	KICU San Jose	KCNS San Francisco
39	<b>KCNS San Francisco</b>	KRON San Francisco*	KTXL Sacramento
40	<b>KTXL Sacramento</b>	KCNS San Francisco	KKPX San Jose
41	<b>KKPX San Jose</b>	KTXL Sacramento	(none)
42	(none)	KKPX San Jose	KCSM San Mateo
43	<b>KCSM San Mateo</b>	(none)	KTVU Oakland*
44	<b>KTVU Oakland*</b>	KCSM San Mateo	KBHK San Francisco
45	<b>KBHK San Francisco</b>	KTVU Oakland*	KQCA Stockton
46	<b>KQCA Stockton</b>	KBHK San Francisco	KTLN Novato
47	<b>KTLN Novato</b>	KQCA Stockton	KSPX Sacramento
48	<b>KSPX Sacramento</b>	KTLN Novato	KSTS San Jose
49	<b>KSTS San Jose</b>	KSPX Sacramento	KTEH San Jose
50	<b>KTEH San Jose</b>	KSTS San Jose	KDTV San Francisco
51	<b>KDTV San Francisco</b>	KTEH San Jose	(none)

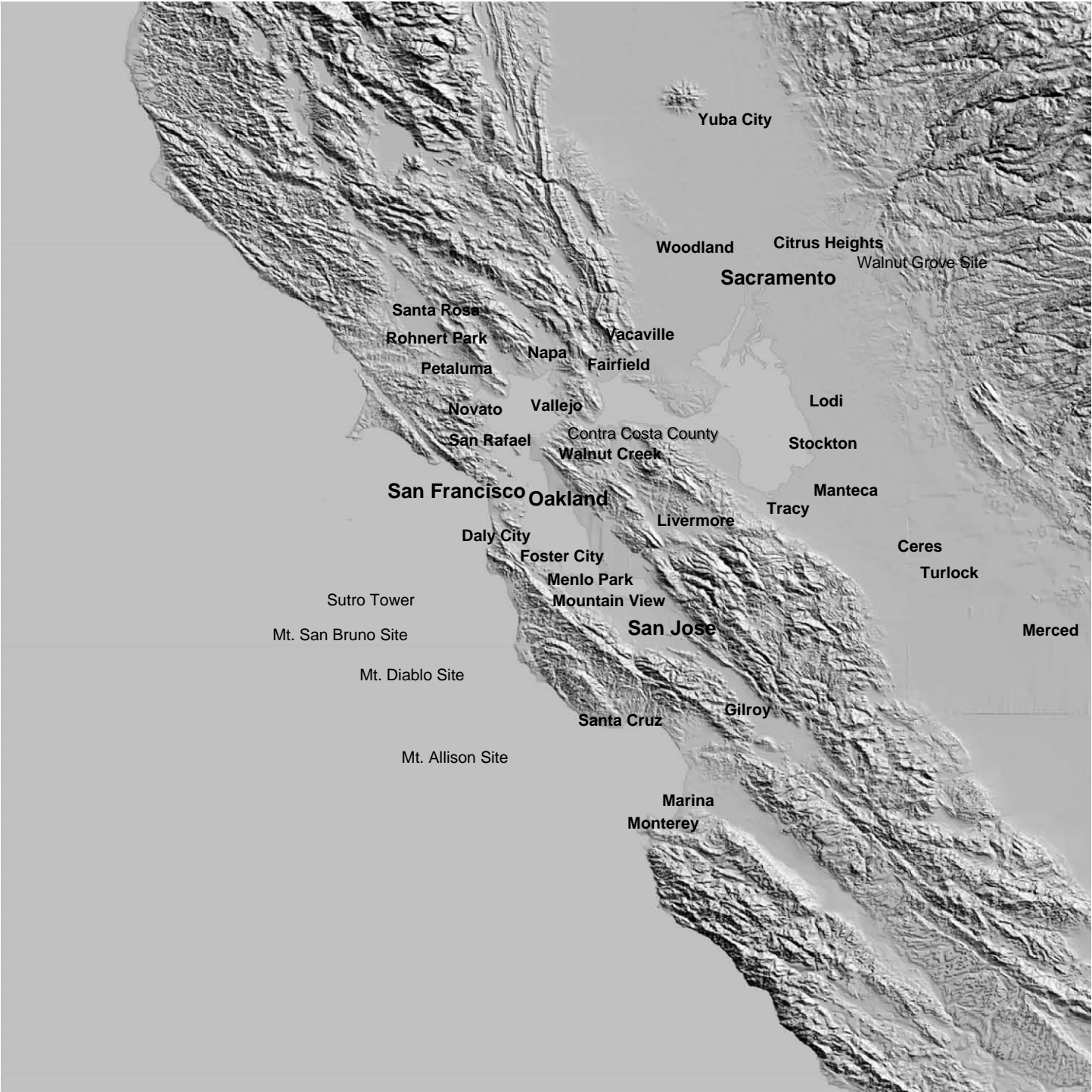
Table VI  
Stations Providing Service to Northern Coverage “Removal” Sector

Station	Location	Channel	ERP (kW)	HAAT (m)
KTNC-DT	Concord	14	50	863
KRCB-DT	Cotati	23	110	628
KTLN-DT	Novato	47	1000	402
KTVU-DT	Oakland	44	811	429
KCRA-DT	Sacramento	35	1000	591
KMAX-DT	Sacramento	21	850	581
KSPX-DT	Sacramento	48	1000	489
KTXL-DT	Sacramento	40	765	581
KXTV-DT	Sacramento	10	1000	595
KBHK-DT	San Francisco	45	400	446
KBWB-DT	San Francisco	19	383	418
KCNS-DT	San Francisco	39	1000	428
KGO-DT	San Francisco	24 (7)	595	509
KPIX-DT	San Francisco	29	1000	506
KQED-DT	San Francisco	30	737	509
KRON-DT	San Francisco	38	712	448
KKPX-DT	San Jose	41	1000	418
KNTV-DT	San Jose	12	103	377
KCSM-DT	San Mateo	43	536	428
KOVR-DT	Stockton	25	760	591
KQCA-DT	Stockton	46	600	580

Table VII  
Stations Providing Service to Southeastern Coverage “Removal” Sector

Station	Location	Channel	ERP (kW)	HAAT (m)
KTNC-DT	Concord	14	50	863
KNSO-DT	Merced	11	45	575
KUVS-DT	Modesto	18	500	555
KION-DT	Monterey	32	46	758
KSMS-DT	Monterey	31	50	701
KCRA-DT	Sacramento	35	1000	591
KMAX-DT	Sacramento	21	850	581
KSPX-DT	Sacramento	48	1000	489
KTXL-DT	Sacramento	40	765	581
KXTV-DT	Sacramento	10	1000	595
KCBA-DT	Salinas	13	20	720
KSBW-DT	Salinas	8	19.2	736
KDTV-DT	San Francisco	51	476	701
KICU-DT	San Jose	36	1000	668
KSTS-DT	San Jose	49	257	688
KTEH-DT	San Jose	50	290	662
KOVR-DT	Stockton	25	760	591
KQCA-DT	Stockton	46	600	580
KCAH-DT	Watsonville	25	81.1	699

Figure 1



35      0      35      70      105      140      175

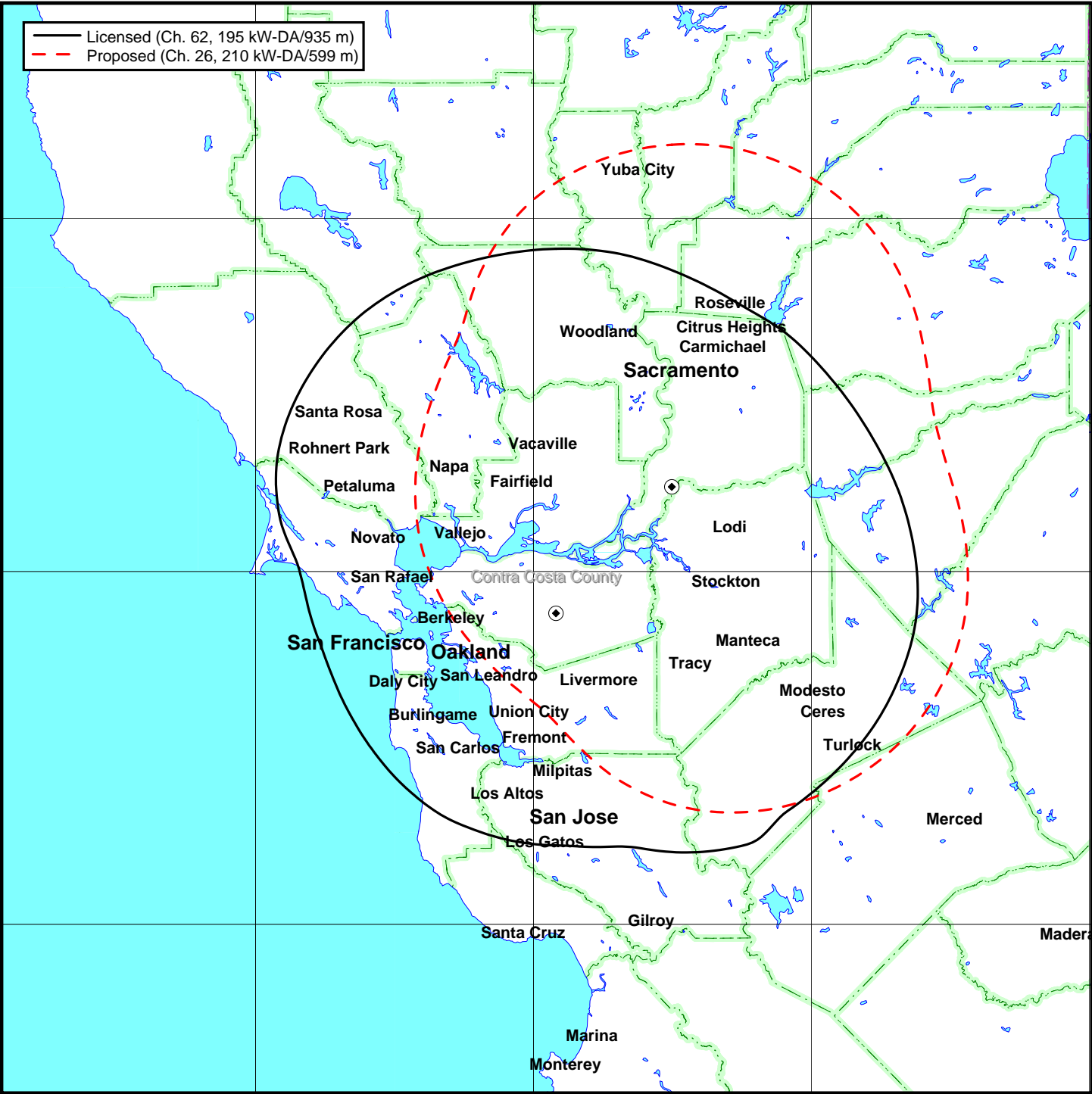
Kilometers

**SITE LOCATIONS**

du Treil, Lundin & Rackley, Inc. Sarasota, Florida



Figure 2

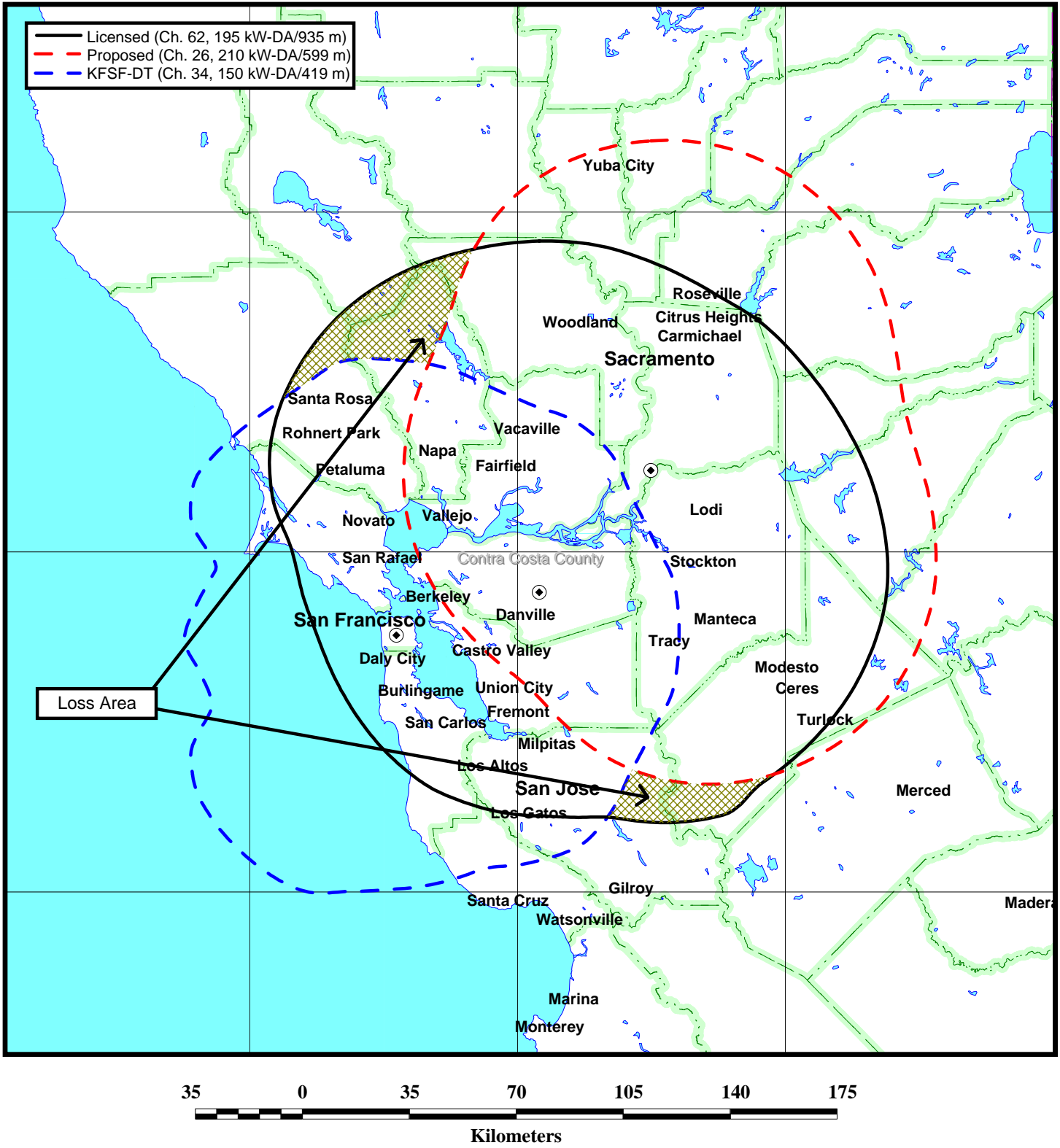


**PREDICTED NOISE-LIMITED FCC CONTOURS**

DTV STATION KTFK-DT  
STOCKTON, CALIFORNIA

du Treil, Lundin & Rackley, Inc. Sarasota, Florida

Figure 3

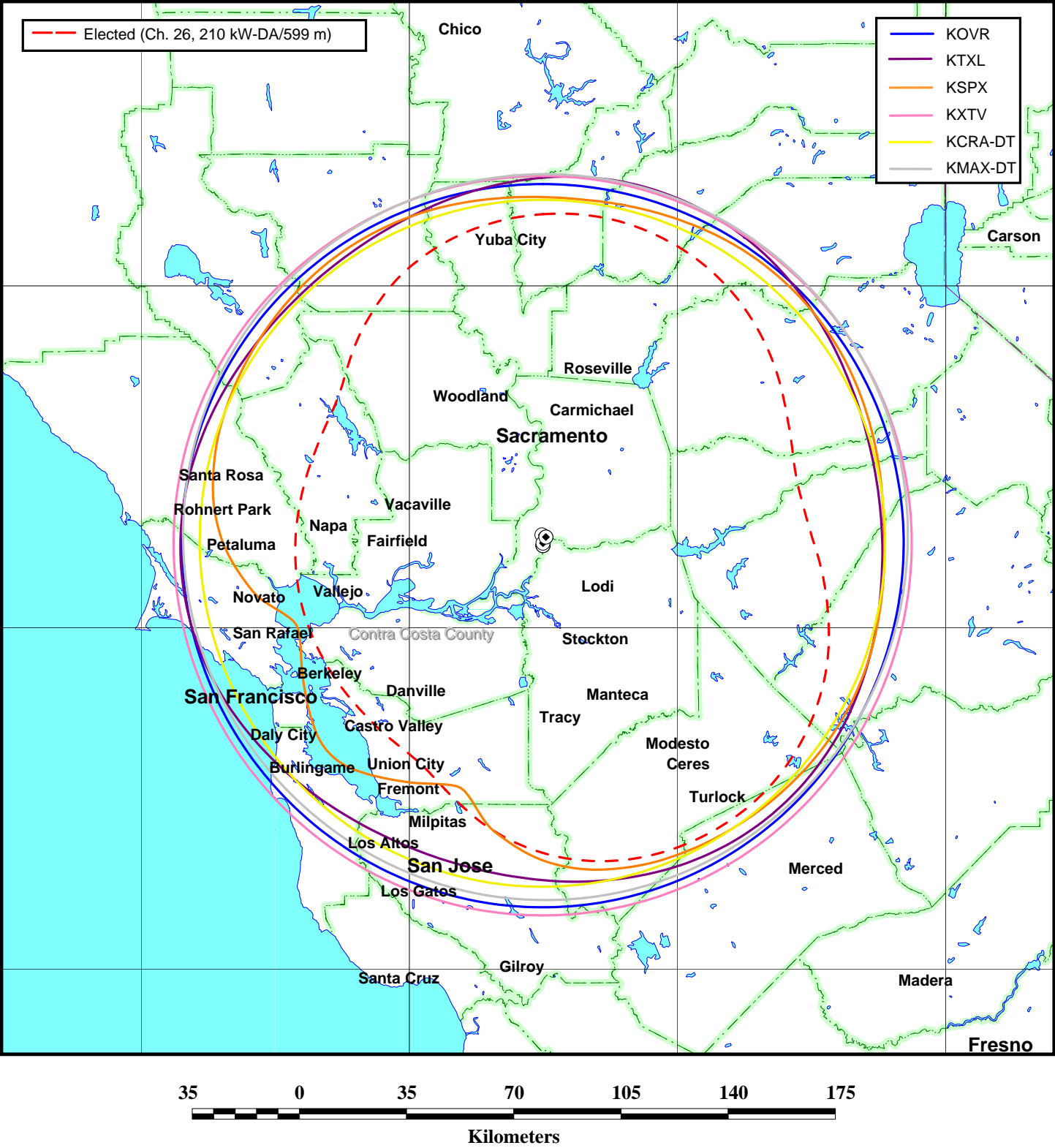


## PREDICTED LOSS AREA

DTV STATION KTFK-DT  
STOCKTON, CALIFORNIA

du Treil, Lundin & Rackley, Inc. Sarasota, Florida

Figure 4



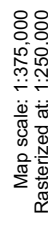
## OTHER DTV SERVICES

### STOCKTON AND SACRAMENTO

du Treil, Lundin & Rackley, Inc. Sarasota, Florida



## Northern "Removal" Sector



Prepared March 2006 by Univision/Telefutura - K. Lahm